



FEDERAL ELECTION COMMISSION
Washington, DC 20463

February 12, 1997

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James Bopp Jr., Esquire
Bopp, Coleson & Bostrom
2 Foulkes Square
401 Ohio Street
P.O. Box 8100
Terre Haute, IN 47808-2434

RE: MUR 3774
Minnesota Citizens Concerned for
Life, Inc.
Minnesota Citizens Concerned for
Life Committee for a Pro-Life
Congress and Jacqueline A.
Schwietz, as treasurer
National Right to Life Committee

Dear Mr. Bopp:

On August 8, 1995, your client, Minnesota Citizens Concerned for Life, Inc., was notified that the Federal Election Commission had found reason to believe it had violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a)(1), provisions of the Federal Election Campaign Act of 1971, as amended, (the "Act") and the Commission's regulations. Also on August 8, 1995, you were notified that the Federal Election Commission had found reason to believe your clients, Minnesota Citizens Concerned for Life Committee for a Pro-Life Congress and its treasurer, had violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a)(1). On that same date, you were notified that the Federal Election Commission had found reason to believe your client, National Right to Life Committee, had violated 2 U.S.C. § 441b(a).

Pursuant to its investigation of this matter, the Commission has issued the attached Subpoenas to Produce Documents and Orders to Submit Written Answers

requiring your clients to provide information which will assist the Commission in carrying out its statutory duty of supervising compliance with the Act.

It is required that your clients submit all answers to questions under oath within 30 days of your receipt of these Subpoenas and Orders. If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Dawn M. Odrowski by
Dawn M. Odrowski
Attorney *mab*

Enclosures
Subpoenas and Orders

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)
) MUR 3774
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Minnesota Citizens Concerned for Life, Inc.
c/o James Bopp Jr., Esq.
Bopp, Coleson & Bostrom
2 Foulkes Square
401 Ohio Street
P.O. Box 8100
Terre Haute, IN 47808-2434

Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment to this Subpoena. Legible copies which, where applicable, show both sides of the documents may be substituted for originals.


Such answers must be submitted under oath and must be forwarded to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463, along with the requested documents within 30 days of receipt of this Order and Subpoena.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his
hand in Washington, D.C. on this *17th* day of *February* 1997.

For the Commission,


John Warren McGarry
Chairman

ATTEST:


Marjorie W. Emmons
Secretary to the Commission

Attachments
Interrogatories and Request for Documents

2025 FEB 17 10 03 AM '97

INSTRUCTIONS

In answering the enclosed interrogatories and the request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from January 1, 1992 through the pendency of this matter.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained. For all types of documentary records requested, if any of these records are maintained on any storage format for computerized information (e.g., hard drive, floppy disk, CD-ROM), provide copies of the records as maintained on that storage format in addition to hard (i.e., paper) copies.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses, the telephone numbers, the present occupation or position of such person, and the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and request for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

"Communications(s)" or "communicated" encompasses both oral and written communications, including phone calls, meetings, correspondence, notes or memos, and electronic mail messages.

INTERROGATORIES

1. State whether Minnesota Citizens Concerned for Life, Inc. has conducted or is currently conducting a voter identification program. If so, briefly describe the program(s).
2. State whether any officer, employee or consultant of Minnesota Citizens Concerned for Life, Inc. communicated in 1992 with Paul Coverdell or any officer, employee, or consultant of Paul Coverdell's 1992 Senate campaign. If so, for each communication, identify all persons involved, state the date or approximate date of the communication, and describe the purpose of the communication.
3. a. State whether any officer, employee or consultant of Minnesota Citizens Concerned for Life, Inc. communicated in 1992 and/or 1994 with any officer, employee, or consultant of the National Republican Senatorial Committee including but not limited to, the following persons: Curt Anderson, Paul Curcio, Enoch Ebong, Liz Owens, Jeb Hensarling, William Harris, David Carney, and Phil Gramm.

b. If the answer to a is in the affirmative, for each communication, identify all persons involved, state the date or approximate date of the communication, and describe the purpose of the communication.
4. State whether any officer, employee or consultant of Minnesota Citizens Concerned for Life, Inc. communicated in 1994 with Rod Grams or any officer, employee, or consultant of Rod Grams 1994 Senate. If so, for each communication, identify all persons involved, state the date or approximate date of the communication, and describe the purpose of the communication.
5. List all get-out-the vote ("GOTV") phone call projects conducted by or on behalf of MCCL, Inc. in 1992. For each program, identify the federal candidate(s) or elections named in the phone calls, identify any and all vendors involved in the project, and provide the total cost of the project.
6. List all get-out-the vote ("GOTV") phone call projects conducted by or on behalf of MCCL, Inc. in 1994. For each program, identify the federal candidate(s) or elections named in the phone calls, identify any and all vendors involved in the program and provide the cost of the project.
7. Identify all MCCL, Inc. officers, directors, employees, consultants or volunteers with knowledge of GOTV phone call projects conducted by or on behalf of MCCL, Inc. in 1992.
8. Identify all MCCL, Inc. officers, directors, employees, consultants or volunteers with knowledge of GOTV phone call projects conducted by or on behalf of MCCL, Inc. in 1994.

9. Describe the purpose of the \$50,000 contribution made to MCCL, Inc. by NRLC, Inc. dated November 4, 1994, a copy of which is attached as Attachment 1 (200060).

10. Identify all MCCL, Inc. officers, directors, employees, consultants or volunteers with knowledge of Attachment 1.

PRODUCTION OF DOCUMENTS

1. Produce all documents that in any way contain, or refer or relate to, any communication or meeting in 1992 between any officer, director, employee or consultant of the Minnesota Citizens Concerned for Life, Inc. and any officer, director, employee or consultant of the National Republican Senatorial Committee, including but not limited to, Curt Anderson, Paul Curcio, Enoch Ebong, Jeb Hensarling and Phil Gramm.

2. Produce all documents that in any way contain, or refer or relate to, any communication or meeting in 1992 between any officer, director, employee and consultant of the Minnesota Citizens Concerned for Life, Inc. and Paul Coverdell or any officer, employee or consultant of the Paul Coverdell's 1992 U.S. Senate campaign.

3. Produce all documents that in any way contain, or refer or relate to, any communication or meeting in 1994 between any officer, director, employee or consultant of the Minnesota Citizens Concerned for Life, Inc. and any officer, director, employee or consultant of the National Republican Senatorial Committee, including but not limited to, Paul Curcio, William Harris, David Carney, Phil Gramm and Liz Owen.

4. Produce all documents that in any way contain, or refer or relate to, any communication or meeting in 1994 between any officer, director, employee and consultant of the Minnesota Citizens Concerned for Life, Inc. and Rod Grams and any officer, director, employee or consultant of the Rod Grams' 1994 U.S. Senate campaign.

5. Produce all documents that in any way contain, or refer or relate to, any voter identification program conducted by or on behalf of MCCL, Inc. in 1992-1994, including but not limited to program handbooks or other documents describing the program, survey questions used in the program, and any contracts with vendors or consultants to conduct such a program.

6. Produce all documents that in any way contain, or refer or relate to, any GOTV phone projects conducted by or on behalf of MCCL, Inc., including but not limited to, scripts, lists, contracts, invoices, checks, correspondence, memos, notes, and electronic mail messages.

7. Produce all bank statements for the bank account into which NRLC's November 4, 1994 check was deposited, and for any account(s) into which the funds from the check was transferred, for the period between October 1, 1994 through January 1, 1995.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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MUR 3774

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Minnesota Citizens Concerned for Life Committee for a Pro-Life Congress
and Jacqueline A. Schwietz, as treasurer
c/o James Bopp Jr., Esq.
Bopp, Coleson & Bostrom
2 Foulkes Square
401 Ohio Street
P.O. Box 8100
Terre Haute, IN 47808-2434

Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment to this Subpoena. Legible copies which, where applicable, show both sides of the documents may be substituted for originals.


Such answers must be submitted under oath and must be forwarded to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463, along with the requested documents within 30 days of receipt of this Order and Subpoena.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his
hand in Washington, D.C. on this *11/11* day of *February* 1997.

For the Commission,


John Warren McGarry
Chairman

ATTEST:


Marjorie W. Emmons
Secretary to the Commission

Attachments
Interrogatories and Request for Documents

2004-04-29 15:03

INSTRUCTIONS

In answering the enclosed interrogatories and the request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from January 1, 1992 through the present.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" or "Minnesota Citizens Concerned for Life Committee for a Pro-Life Congress (MCCL PAC)" shall mean the named respondents in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained. For all types of documentary records requested, if any of these records are maintained on any storage format for computerized information (e.g., hard drive, floppy disk, CD-ROM), provide copies of the records as maintained on that storage format in addition to hard (i.e., paper) copies.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses, the telephone numbers, the present occupation or position of such person, and the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and request for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

"Communication(s)" or "communicated" encompasses both oral and written communications, including phone calls, meetings, correspondence, notes or memos, and electronic mail messages.

INTERROGATORIES

1. State whether any officer, director, employee or consultant of Minnesota Citizens Concerned for Life Committee for a Pro-Life Congress ("MCCL PAC") communicated in 1992 with Paul Coverdell or any officer, director, employee, or consultant of Paul Coverdell's 1992 U.S. Senate campaign. If so, for each communication, identify all persons involved, state the date or approximate date of the communication, and describe the purpose of the communication.
2. State whether any officer, director employee or consultant of MCCL PAC communicated in 1992 with any officer, director, employee, or consultant of the National Republican Senatorial Committee including but not limited to, Curt Anderson, Paul Curcio, Enoch Ebong, Jeb Hensarling, and Phil Gramm. If so, for each communication, identify all persons involved, state the date or approximate date of the communication, and describe the purpose of the communication.
3. State whether any, officer, director, employee or consultant of MCCL PAC communicated in 1994 with Rod Grams or any officer, director, employee, or consultant of Rod Grams' 1994 Senate campaign. If so, for each communication, identify all persons involved, state the date or approximate date of the communication, and describe the purpose of the communication.
4. State whether any officer, director employee or consultant of MCCL PAC communicated in 1994 with any officer, director, employee, or consultant of the National Republican Senatorial Committee, including, but not limited to, Paul Curcio, Liz Owen, William Harris, David Carney and Phil Gramm. If so, for each communication, identify all persons involved, state the date or approximate date of the communication, and describe the purpose of the communication.
5. Identify all MCCL PAC officers, directors, employees, consultants or volunteers who were involved in any way in MCCL PAC's contributions to, and independent expenditures on behalf of, Paul Coverdell in 1992. Briefly describe each person's role.
6. Identify all MCCL PAC officers, directors, employees, consultants or volunteers who were involved in any way in MCCL PAC's contributions to, and independent expenditures on behalf of, Rod Grams in 1994. Briefly describe each person's role.
7. Identify all vendors or other persons involved in the GOTV phone calling for Rod Grams for which MCCL PAC made reimbursements to the MCCL General Fund on November 17, 1994 (see Attachment 1).

8. Identify the source of the list(s) use in the GOTV phone calls conducted by or on behalf of MCCL PAC for Rod Gram's 1994 U.S. Senate election in Minnesota.

PRODUCTION OF DOCUMENTS

1. Produce all documents that in any way contain, or refer or relate to, any communication in 1992 between any officer, director, employee or consultant of MCCL PAC and any officer, director, employee or consultant of the National Republican Senatorial Committee, including but not limited to, Curt Anderson, Paul Curcio, Enoch Ebong, Jeb Hensarling and Phil Gramm.
2. Produce all documents that in any way contain, or refer or relate to, any communication in 1992 between any officer, director, employee and consultant of MCCL PAC and Paul Coverdell or any officer, employee or consultant of the Paul Coverdell's 1992 U.S. Senate campaign.
3. Produce all documents that in any way contain, or refer or relate to, any communication in 1994 between any officer, director, employee or consultant of MCCL PAC and any officer, director, employee or consultant of the National Republican Senatorial Committee, including but not limited to, Paul Curcio, William Harris, David Carney, Phil Gramm and Liz Owen.
4. Produce all documents that in any way contain, or refer or relate to, any communication in 1994 between any officer, director, employee or consultant of MCCL PAC and Rod Grams or any officer, director, employee or consultant of Rod Grams' 1994 U.S. Senate campaign.
5. Produce all documents that in any way contain, or refer or relate to, MCCL PAC contributions to, and independent expenditures on behalf of, Paul Coverdell for the 1992 election U.S. Senate election in Georgia, including the November 24, 1992 runoff election. The documents produced should include, but not be limited to, contracts with vendors and consultants or other contractors; scripts used in polls, surveys, GOTV phone calls, or radio and television ads; voter guides; print advertisements; any documents contained in any direct mailings and any correspondence, memo or notes.
6. Produce all documents that in any way contain, or refer or relate to, MCCL PAC contributions to, and independent expenditures on behalf of, Rod Gram's 1994 election for U.S. Senate in Minnesota. The documents produced should include contracts with vendors and consultants or other contractors; scripts used in polls, surveys, GOTV phone calls, or radio and television ads; voter guides; print advertisements; any documents contained in any direct mailings; and any correspondence, memo or notes.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)
) MUR 3774
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SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

National Right to Life Committee
c/o James Bopp, Jr., Esquire
Bopp, Coleson & Bostrom
2 Foulkes Square
401 Ohio Street
P.O. Box 8100
Terre Haute, IN 47808-2434

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Such answers must be submitted under oath and must be forwarded to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463, along with the requested documents within 30 days of receipt of this Order and Subpoena.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set
his hand in Washington, D.C. on this 11th day of February 1997.

For the Commission,


John Warren McGarry
Chairman

ATTEST:


Marjorie W. Emmons
Secretary to the Commission

Attachments
Interrogatories and Request for Documents

INSTRUCTIONS

In answering the enclosed interrogatories and the request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

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DEFINITIONS

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"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, political committee or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained. For all types of documentary records requested, if any of these records are maintained on any storage format for computerized information (e.g., hard drive, floppy disk, CD-ROM), provide copies of the records as maintained on that storage format in addition to hard (i.e., paper) copies.

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"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses, the telephone numbers, the present occupation or position of such person, and the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and request for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

"Communication(s)" or "communicated" encompasses both oral and written communications, including phone calls, meetings, correspondence, notes or memos, and electronic mail messages.

INTERROGATORIES

1. Identify the persons at National Right to Life Committee who have the most knowledge of the Voter Identification Program referenced in Part III of National Right to Life Committee's 1992 and 1994 Form 990 tax returns.
2. State whether any officer, director, employee or consultant of National Right to Life Committee communicated in 1992 with Paul Coverdell or with any officer, employee, or consultant of Paul Coverdell's 1992 U.S. Senate campaign. If so, for each communication, identify all persons involved, state the date or approximate date of the communication, and describe the purpose of the communication.
3. State whether any officer, director, employee or consultant of the National Right to Life Committee communicated in 1994 with the following persons:
 - a. Rick Santorum or any officer, employee or consultant of Rick Santorum's 1994 U.S. Senate campaign.
 - b. Rod Grams or any officer, employee or consultant of Rod Grams' 1994 U.S. Senate campaign.
4. If the answers to Interrogatory Numbers 3a and 3b are affirmative, for each communication, identify all persons involved, state the date or approximate date of the communication, and describe the purpose of the communication.
5. List by state all get-out-the vote ("GOTV") phone call projects conducted by or on behalf of National Right to Life Committee between January 1, 1992 and December 31, 1992. For each program, identify the federal candidate(s) or elections named in the phone calls, identify any and all vendors involved in the project, and provide the cost of the project.
6. List by state all get-out-the vote ("GOTV") phone call projects conducted by or on behalf of National Right to Life Committee between January 1, 1994 and December 31, 1994. For each program, identify the federal candidate(s) or elections named in the phone calls, identify any and all vendors involved in the project, and provide the cost of the project.
7. Identify the source of the list(s) used in the following GOTV telephone call projects:
 - a. GOTV phone calls made by Infocision Management Corporation in connection with the 1992 Georgia U.S. Senate runoff election (see Attachment 1)
 - b. GOTV phone calls made by Optima Direct in connection with the 1994 U.S. Senate election in Pennsylvania (see Attachment 2)
 - c. GOTV calls made by Omega Communications, Inc. in connection with the 1994 U.S. Senate election in Pennsylvania (see Attachment 3)

d. GOTV calls made by MDS Communications, Inc. in connection with the 1994 U.S. Senate election in Pennsylvania (see Attachment 4)

e. GOTV phone calls made by Optima Direct in connection with the 1994 U.S. Senate election in Minnesota (see Attachment 5)

8. Identify all bank or other financial accounts used by National Right to Life Committee during the period between January 1, 1992 and December 1, 1994, listing for each account the bank or other institution at which the account is kept, the type of account, and the account number.

9. State whether National Right to Life Committee made any contributions to the Christian Coalition or any of its affiliates between January 1, 1992 and December 31, 1994 besides the two December 1992 contributions to the Christian Coalition and Georgia Christian Coalition. If so, state the date, amount and purpose of each contribution.

PRODUCTION OF DOCUMENTS

1. Produce all appointment books, desk calendars, planners, diaries or other such documents used by the following officers, directors, and/or employees of the National Right to Life Committee from January 1, 1992 through December 31, 1992 and from January 1, 1994 through December 31, 1994.

- a. David O'Steen
- b. Darla St. Martin
- c. Jacki Ragan

2. Produce all documents that in any way contain or refer to any communication in 1992 between any officer, director, employee or consultant of the National Right to Life Committee and any officer, director, employee or consultant of the National Republican Senatorial Committee, including, but not limited to, Curt Anderson, Paul Curcio, Enoch Ebong, Jeb Hensarling and Phil Gramm, concerning federal elections.

3. Produce all documents that in any way contain or refer to any communication in 1992 between any officer, director, employee or consultant of the National Right to Life Committee and Paul Coverdell or any officer, employee or consultant of Paul Coverdell's 1992 U.S. Senate campaign.

4. Produce all documents that in any way contain or refer to any communication in 1994 between any officer, director, employee or consultant of the National Right to Life Committee and any officer, director, employee or consultant of the National Republican Senatorial Committee, including, but not limited to, Paul Curcio, Liz Owen, William Harris, David Carney, and Phil Gramm, concerning federal elections.

5. Produce all documents that in any way contain or refer to any communication in 1994 between any officer, director, employee and consultant of the National Right to Life Committee and the following:

- a. Rick Santorum and any officer, director, employee or consultant of the 1994 Rick Santorum Senate campaign;
- b. Rod Grams and any officer, director, employee or consultant of the 1994 Rod Grams Senate campaign.

6. Produce all documents describing National Right to Life Committee's Voter Identification Program and all surveys used in that program in 1992-1994.

7. Produce all scripts used by National Right to Life Committee and/or its vendors or contractors in the GOTV programs identified in Interrogatory Numbers 5 and 6.

8. Produce all bank statements for the bank account into which 1992 and 1994 checks from the National Republican Senatorial Committee were deposited (Account No. 6670042032 at the Signet Bank) covering the periods of September 1, 1992 through January 1, 1993 and September 1, 1994 through January 1, 1995.
9. Produce any and all contracts or other agreements with Infocision Management Corporation or other vendors for the GOTV phone calls made in connection with the 1992 Georgia U.S. Senate runoff election.
10. Produce any and all contracts or other agreements with MDS Communications, Inc. or other vendor or contractor for the GOTV phone calls made in connection with the 1994 U.S. Senate election in Pennsylvania.